

# EXHIBIT 236

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**From:** John Dowling <John Dowling/KiddePLC/UK/Kidde@Kidde> on behalf of John Dowling  
**Sent:** Friday, October 18, 2002 4:31 PM  
**To:** David Spring; Carl McLoughlin; Mike Willson; Ashley Price; Anne Regina; Peter Moore  
**Cc:** Christopher Milburn; Jack Hittson; Ron Fleming; Stephen Summerill; Richard H DeMarle  
**Subject:** PFOA Draft

I copy an attachment below - which refers to a draft recently published and entered into the public record, as far as PFOA is concerned.

The publication of this preceded this past week's FFFC meeting in Washington (JBD in the chair) and will be referred to, within the next FFFC Newsletter - which is currently under preparation.

Since it is over 100 pages in content, I would not advise printing (Hard copy available in Central R&D). Technical recipients will be able to deduce potential future consequence, but for others of less technical bent I offer the following comments:-

This study follows on from (although separate and not directly related to it ) the detailed study of PFOS, which is now designated as a PBT as far as the EPA are concerned.

PFOS is the constituent chemical which was instrumental, within the 3M decision to vacate several of their lucrative market sectors (of which AFFF was a relatively minor example).

PFOA (Perfluoro-octanoic acid) was also an ingredient deliberately included within many 3M formulations (including Light Water's).

'Our' AFFF,s and Fluorine supported foams, being derived from telomer chemistry, do not include either PFOS or PFOA and are not restricted by any association with the PFOS (SNUR) findings and restrictions of yesteryear, or by these latest findings regarding PFOA.

REMEMBER THAT, NORMALLY, HAZARD ASSESSMENTS AND CONTROLS ARE USUALLY CONFINED TO CONSTITUENT CHEMICALS WITHIN PRODUCTS. Kidde products contain no PFOS per se, nor can that chemical structure be replicated within our products.

As chemists (with knowledge of telomer structure and formulation) will be aware, PFOA (and salts thereof) could eventually appear as degradation products within formulations which encompass telomer products.

This published data, although concluding that PFOA could be legitimately considered to be a PBT hazard, is not of any similar magnitude or consequence as PFOS.

Our Companies must be aware that 'detractors' of Fluorine supported foams, will be quick to try and use this paper to indicate that Telomer derived foams are as inherently suspect, as environmentally proven PFOS is now proven to be.

#### WHERE DOES THIS LEAVE US AT PRESENT?

The recent development of the fluorine free product offering from Angus is, as anticipated, a prudent and positive position. Work directed towards fluorine free offerings for the N.American markets (via KFF) is well justified.

It is extremely unlikely that the much smaller 'risk', associated with Telomer component inclusion within our fluorine containing foams, will be exposed to the same extent that the (3M) PFOS/PFOA supported foams were open to.

Our friends at Williams F&H (And Ansul, as their exclusive manufacturer of Thunderstorm) can draw little comfort from the fact that they are shipping foam which has a 2-3 x content of fluoro chemical per se. I am sure our companies will be quick to exploit that fact commercially.

This latest pronouncement, does not invalidate or diminish the efforts being made by FFFC. I urge continued support of that Organisation - as it takes the struggle to more complex heights.

John Dowling

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